

TO: Ken Collard
Kalamazoo City Manager

From: Jeff Rhinefield
Environmental Quality Site Manager

Date: May 9, 2012

Subject: City Noise Ordinance

CC: Craig Thomas, USEPA, OSC
Paul Ruesch, USEPA, OSC
Bruce Merchant, City of Kalamazoo
Debbie Jung, City of Kalamazoo

Environmental Quality is issuing this notice to all parties listed above due to necessity of bypassing the creek flow in Portage Creek to accommodate PCB sediment removal dredging. (EQ) anticipates the noise level of bypass pumps, along with heavy equipment and trucks, may exceed the noise levels documented in the City Noise Ordinance.

Over the 2012 construction season, EQ will be bypassing the estimated 20,000 gpm of creek flow to accommodate PCB sediment removal. To accomplish this, between Stockbridge Ave. and Vine St., EQ intends to remediate separate sections of the creek at a time, installing a series of cofferdam walls with heavy equipment and sheet piling, bypassing the flow with 24" diesel pumps, and removing PCB sediment with heavy equipment and trucks for offsite disposal. Upon completion of the sediment removal, those same sections will be backfilled and restored before moving to the next section of creek.

EQ will be required to use a 24" diesel pump to accomplish the bypass pumping. The bypass pumping system will need to be operated 24 hrs. a day, 7 days a week until that immediate section of creek that is isolated is completed. Only one 24" diesel pump is planned to operate at a time, however, when maintenance is required on a pump, the second 24" pump will be brought on line just prior to shutting off the pump to be maintained. This will be done to ensure that the creek water does not enter the areas being excavated.

EQ will utilize engineering controls to abate and minimize the levels of noise in those work during the removal process. EQ intends to install a series of controls for the pump that will include a double wall sound curtain around the operational pump, and the standby pump. The sound curtain will reduce the noise 5-12 dB(A)s, decibels, during their operation. EQ will also plan only to operate the heavy equipment and trucks during the hours of 7:00AM and 7:00 PM. In the case of an emergency, or safety issue, EQ will be required to operate beyond the specified hours. This will not be done to circumvent the City's noise ordinance, it will only be done when unforeseen circumstances may dictate operations outside normal working hours to ensure the safety of the crew and general public.

EQ is planning an aggressive work schedule of 12 hrs. a day, 7 days a week, including holiday's, to ensure swift completion of the sections of the creek and the ability to shut down the pumps and remove the sheeting walls and equipment immediately upon completion of sediment removal and restoration.

EQ, as the general contractor working for the USEPA Region V for this scope of work, will be the responsible party directly supervising the operation of the pumps, and for maintaining the safety of the public in the immediate area of the pumps. EQ anticipates offhours security in the immediate area of the pumping operation 7 days a week until completion.

The operation of the bypass pump is critical in affording EQ and the EPA the access to remove the contaminated sediments in this operation. If the creek flow is not bypassed, it would cause unnecessary hardship by adding unnecessary and additional costs to the cleanup. More importantly, it would increase the chance of excavated PCB-contaminated sediment being caught up in the current to spread downstream, creating a potential public health threat.

Feel free to contact me with any further questions, or if a meeting is necessary before EQ proceeds with this approach. I can be contacted by phone or e-mail at (513) 309-4703, or : jrhinefield@eqm.com .